

CNL(26)23

Review of Draft Conservation Commitments Report

Date	Party / jurisdiction	Draft CCR – February 2026
February 2026	EU-Spain (Asturias)	EU_Spain_Asturias - Draft CCR submitted February 2026

Overview of Conservation Commitments Report

Overall Comments / Recommendations

- The capture and re-stocking of juvenile salmon to avoid extreme temperatures is an innovative management strategy to avoid the impacts of climate change while habitat restoration measures are implemented.
- The actions appear not to reflect new actions, but rather are extensions of existing actions that do not lend themselves to significantly addressing the stressor within the duration of this reporting cycle.
- The climate and physical barrier stressors can be enhanced through the addition of another action that identifies new actions such as tree planting or new connectivity projects that will lend themselves towards addressing the stressor

Consultation and Engagement

CCR reference	Review Question	Comments / Recommendations
E.1. E.2.	Are the questions in the ‘Consultation and Engagement’ section of the CCRs answered fully?	Yes.

Stressors

CCR reference	Review Question	Comments / Recommendations
Stressor Justification	Are the top three stressors identified in the Party’s / jurisdiction’s stressor analysis used as the basis for the CCRs?	Yes.

	If not, are the justifications provided for the substitutions adequate?	Not applicable.
--	--	-----------------

Stressor 1

CCR reference	Review Question	Comments / Recommendations		
S.1.a.	Are NASCO's theme areas identified?	Yes.		
S.1.b. S.1.c. S.1.d.	Is the impact of the stressor on wild Atlantic salmon described clearly?	Yes.		
	Are there no more than three actions for this stressor?	Yes.		
		Action 1	Action 2	Action 3
S.1.1.d S.1.2.d S.1.3.d.	Does the action have a clear and measurable tangible outcome to improve conditions for salmon survival through the removal or diminishment of the identified stressor (i.e. in line with NASCO's Strategic Goal)?	In part. This action aims to cull 150 cormorants annually to lessen predation pressure on Atlantic salmon, though the expected direct impact on salmon is not clearly described (i.e. expected increase in salmon productivity resulting from reduced predation).		
S.1.1.c. S.1.2.c. S.1.3.c.	Does the action have a clear starting point (baseline) against which progress towards the outcome can be measured?	Yes. The goal is focused on maintaining a consistent cull rate throughout the reporting cycle.		
S.1.1.e. S.1.2.e.	Are clear interim goals / milestones identified for this action?	Yes.		

S.1.3.e.		The milestones are to maintain a consistent cull rate of 150 cormorants each year.		
S.1.4.	Does this stressor include a quantitative baseline and tangible outcome to enable progress towards the achievement of the Strategic Goal to be measured?	In part. This could be strengthened by providing a greater quantitative understanding of the impact of predation by cormorants on Atlantic salmon		
Comments / Recommendations				
It is well established that cormorant predation poses a significant threat to salmon, especially when salmon populations are very low. Providing some context as to why the culling of 150 birds was established as a goal rather than 50 birds or 300 birds would help enhance this action.				

Stressor 2

CCR reference	Review Question	Comments / Recommendations		
S.2.a.	Are NASCO's theme areas identified?	Yes.		
S.2.b. S.2.c. S.2.d.	Is the impact of the stressor on wild Atlantic salmon described clearly?	Yes.		
	Are there no more than three actions for this stressor?	Yes.		
		Action 1	Action 2	Action 3
S.2.1.d S.2.2.d S.2.3.d.	Does the action have a clear and measurable tangible outcome to improve conditions for salmon survival through the removal or diminishment of the identified stressor (i.e. in line with NASCO's Strategic Goal)?	In part. This action aims to compensate for the loss of freshwater production by capturing and retaining fish in a hatchery to avoid exposure to extreme summer temperatures. This is a creative and innovative approach to mitigate for the		

		impacts of climate change. That said, the action itself is a mitigative measure that doesn't contribute to the removal or diminishment of the identified climate change stressor.		
S.2.1.c. S.2.2.c. S.2.3.c.	Does the action have a clear starting point (baseline) against which progress towards the outcome can be measured?	Yes. The baseline represents the current stocking rate of 15,000 juvenile salmon		
S.2.1.e. S.2.2.e. S.2.3.e.	Are clear interim goals / milestones identified for this action?	In part. Although a consistent stocking rate of 15,000 juvenile salmon is identified, the description of the action states that stocking will be increased. This increase is not reflected in the milestones.		
S.2.4.	Does this stressor include a quantitative baseline and tangible outcome to enable progress towards the achievement of the Strategic Goal to be measured?	No. Although the proposed action for this stressor can serve to temporarily mitigate the impacts of climate change, the restocking program by itself does not address the stressor. This stressor could be strengthened if this action was paired with another action such as riparian planting and/or dam removal, that aims to provide additional cover for salmon or improve access to areas with cooler waters. The approach would be to conserve salmon through the restocking program while habitat restoration measures are being implemented.		
Comments / Recommendations				
<p>This is a continuation of existing efforts that will maintain an existing condition, as no new actions are being proposed. Therefore, it is unclear how this effort will move towards a significant reduction of the identified stressor.</p> <ul style="list-style-type: none"> We recognize that this is a mitigative measure that may be necessary to conserve salmon in the face of climate change. It details an innovative approach to protect salmon from temperature extremes that they would otherwise experience in the wild. That said, since this action is not paired with another action that may help address warming water temperatures, such as tree planting, this action alone does not improve salmon survival by removing or diminishing the identified stressor. 				

- This stressor could be strengthened if this action was paired with another action such as riparian planting and/or dam removal that aim to provide additional cover for salmon or improve access to areas with cooler waters. The approach would be to conserve salmon through the restocking program while habitat restoration measures are being implemented.
- We appreciate the need for the re-stocking program to conserve salmon that are impacted by warming water temperatures. As with any stocking program, as you are aware, we need to be mindful of the impacts of stocking on wild populations and consider the cost/benefit that stocking may provide. For your consideration, NASCO updated their stocking guidelines in 2025 (CNL(25)50). These guidelines provide useful guidance to consider when implementing stocking programs for the purposes of stock rebuilding.

Stressor 3

CCR reference	Review Question	Comments / Recommendations		
S.3.a.	Are NASCO's theme areas identified?	Yes.		
S.3.b. S.3.c. S.3.d.	Is the impact of the stressor on wild Atlantic salmon described clearly?	Yes.		
	Are there no more than three actions for this stressor?	Yes.		
		Action 1	Action 2	Action 3
S.3.1.d S.3.2.d S.3.3.d.	Does the action have a clear and measurable tangible outcome to improve conditions for salmon survival through the removal or diminishment of the identified stressor (i.e. in line with NASCO's Strategic Goal)?	No. Although this is really important work, continued maintenance of these fishways are maintaining an existing condition and doesn't move towards the removal or diminishment of the stressor.		

S.3.1.c. S.3.2.c. S.3.3.c.	Does the action have a clear starting point (baseline) against which progress towards the outcome can be measured?	Yes. Six fishways are currently being maintained and represent the current starting point.		
S.3.1.e. S.3.2.e. S.3.3.e.	Are clear interim goals / milestones identified for this action?	Yes. The goal is to continue maintenance of the six fishways.		
S.3.4.	Does this stressor include a quantitative baseline and tangible outcome to enable progress towards the achievement of the Strategic Goal to be measured?	No. This project aims to maintain passage conditions for salmon. There is no additional work that would expand access to habitats beyond current conditions.		
Comments / Recommendations				
<p>We recognize that this is important work that needs to be done to ensure the safe passage of salmon. However, this is a continuation of existing efforts that will maintain an existing condition as no new actions are being proposed. Therefore, it is unclear how this effort will move towards a significant reduction of the identified stressor.</p> <p>Recommended revision: A second action that identifies opportunities for new fish passage projects (e.g. fishway construction, dam removals, or road crossing improvements) that could be implemented over the duration of this reporting cycle would lend itself towards addressing this stressor.</p>				